



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OREGON OPERATIONS OFFICE
PORTLAND, OREGON 97204

August 10, 1988

REPLY TO 000
ATTN OF:

MEMORANDUM

SUBJECT: S.J. Nudelman & Son, Inc.
TSCA Inspection Report

FROM: Ron Culver, P.E., Oregon Operations Office
Environmental Engineer

TO: Gil Haselberger, Chief
Toxic Substances Section - AT-083

THRU: Al Goodman, Chief
Hazardous Waste Section

The enclosed report is the result of my inspection of Nudelman Scrap Metal on August 4, 1988. Please call me at FTS 423-2676 if you have any questions.

This 2 acre site has been used for scrap and salvage operations by Mr. Nudelman for about 25 years. Nearly all of the site is inaccessible due to huge piles of scrap laced with briars. Mr. Nudelman has no long range or near term plans for the site. During the inspection, one man was using a cutting torch to dismantel electrical panels. This is a typical scrap and salvage site where alot of oil has been spilled on the ground in the past and present. I am recommending the site be placed on the CERCLIS for further evaluation.

#0610F

USEPA SF



1300580

TSCA Report

Facility

Nudelman & Son, Inc.
2707 N.W. Nela Street
Portland, Oregon 97210

Site Address

Same
Phone: 226-4051

Inspector

Ron I. Culver, P.E., Environmental Engineer
EPA, Oregon Operations Office

Inspection Date and Time

August 4, 1988 starting at 9:10 A.M.

Background

This facility was part of the scrap and salvage inspection scheme. It was scheduled for inspection in FY 88. Since 000 had received calls from concerned individuals regarding the salvage of transformers and the spilling of oil, this inspection was done by 000 although it was to be done by ATD, the regional office. No prior notice was given to the facility because of the urgent nature of the complaint.

Introduction and Records Review

I entered the Nudelman office and met Marvin Nudelman, Vice-President and Stanford J. Nudelman, Owner-Manager; the latter is the father of the former. Credentials were shown and Notices of Inspection and Confidentiality were provided and signed by S.J. Nudelman.

The purpose of the inspection was explained and records were requested for the transformers I observed at the entry way to the 2 acre site. No records could be found initially but a file was produced later that was full of invoices, general descriptions and tonnage data. No PCB test results could be found. No copy machine was available so I recorded the following on the BPA/GSA shipments, Sale and Contract:

Sale 10FB-P-84-04TC

Award 284443

Contract GS-10S-410262

Letter November 9, 1984 from BPA; Payment past due for Transformers, Breakers and Capacitors. Only a few Bill No's were copied:

Bill # 105025

Bill # 1015184

Bill # G-074096; 11,310 lbs weight

Bill # G-105022; 10/4/84; 2,894 lbs weight

Estimated total weight approximately over 100,000 lbs. No record of any PCB test was found.

Site Tour

The two acre or less site was totally covered with scrap. Most of the front 1/2 of the site was covered up to 8 ft. deep with scrap mixed with Pacific Northwest Bell telephone equipment. Large panels containing hundreds of small enclosed units that look like capacitors were seen. Blackberries have nearly taken over the entire site. The back 1/2 of the site holds much older scrap. Some piles have decayed into heaps of rust. More electrical equipment was seen, but little oil filled units other than small electrical panels.

BPA was the source of the large "CAPACITOR-POTENTIAL-TRANSFORMER" units, ie, BUSHINGS.

See pictures 7, 9, 11, 12

The first name plate I saw (see picture 7):

Messwandler - Bau GMBH - Bamberg

SN 71/399944, American Elin Corp

American Broadway, New York

Bushing Manufacturer: STEMAL; 1971

There was no mention of the word oil on the name plate. These units were liquid filled until salvaged. Large stains were seen on the ground where the units had been broken open or dismantled. Parts of these "Bushing-Transformers" were found all over the site. There may have been over 50 of them originally. All observed appeared nearly identical. One nameplate showed the Bushing Manufacturer: "SEMENS" with SN 71/411590. It was marked sampled 1-9-84, apparently by BPA. Oil had run onto the ground from this unit. Picture 9 in the corner, next to a bottom tank from another unit. All these units were purchased thru GSA or BPA for salvage in 1984. Some were still in crates where they were 4 years ago - untouched. Some other serial numbers were:

72/451156

72/451158

72/451157

A different type GE transformer was found about in the middle of the site. The word oil was not on the label which stated: "High Voltage Testing Set" SN 6408310 Typek, 50,000v 115/230". The size was about 35 gallons. See picture 8. Oil stains show on the outside of this unit.

Sampling

I collected 3 samples to determine if contaminated PCB oil is being spilled on the ground. Sample-1: 88320075 was heavily stained ground samples from 4 locations along entry. See sketch. This is where many bushings from BPA had been demolished and alot of oil spilled. Sample-2: 88320076 was a wipe sample where a capacitor was leaking at the bushing; see picture 13. Sample-3: 88320077 was oil absorbed from a small capacitor that was broken and had spilled out; see picture 14. The second and third samples may not be from BPA equipment because no nameplate was visible. Test results will be forwarded when received from DEQ. Also, BPA is looking for any test results they can find on this shipment.

Exit Meeting

Stanford Nudelman was advised that EPA would be sending him a letter when we get test results. He maintains that he never had any PCB contaminated equipment, especially from BPA; they would never have sold him any PCB contaminated scrap. See phone memo of my discussion with Mr. Nudelman on August 9, 1988; Attachment 10.

Enclosures:

1. TSCA - Notice of Inspection
2. TSCA - Inspection Confidentiality Notice
3. PCB Inspection Plan
4. Field Sample Data Sheet
5. Receipt for samples and documents
6. Chain of Custody Record
7. Site Sketch
8. Pictures List
9. Pictures
10. Phone Memo
11. Location Map

#0611F



US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

NOTICE OF INSPECTION

Form Approved
OMB No. 2070-0007
Expires 3-31-88

ATTACHMENT 1

1. INVESTIGATION IDENTIFICATION			2. TIME	3. FIRM NAME
DATE 8/4/88	INSPECTOR NO. 1450	DAILY SEQ. NO.	9:10 am	Nudelman & Son Inc / ABC & J. Recycling
4. INSPECTOR ADDRESS			5. FIRM ADDRESS	
811 SW 6th Ave Portland			2707 N.W. NELA St. Portland, Oreg. 97210	

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been complied with.

☐ In addition, this inspection extends to (Check appropriate blocks):

☐ A. Financial data

☐ D. Personnel data

☐ B. Sales data

☐ E. Research data

☐ C. Pricing data

The nature and extent of inspection of such data specified in A through E above is as follows:

INSPECTOR SIGNATURE 		RECIPIENT SIGNATURE 	
NAME RON CULVER		NAME STANLEY J. NUDELMAN	
TITLE Env. Engr.	DATE SIGNED 8/4/88	TITLE MGR. Owner	DATE SIGNED 8-4-88

REGIONAL OFFICE

INSPECTOR'S FILE



TSCA INSPECTION CONFIDENTIALITY NOTICE

ATTACHMENT 2

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME
DATE 8/4/88	INSPECTOR NO. 1450	DAILY SEQ. NO.	Nudelman & Son Inc
3. INSPECTOR NAME Ron Culver			4. FIRM ADDRESS 2707 NW Nela St Portland, Oreg. 97210
5. INSPECTOR ADDRESS 811 SW 6th Ave Portland Ore 97204			6. CHIEF EXECUTIVE OFFICER NAME STANFORD J. NUDELMAN
			7. TITLE OWNER-MGR

TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged, unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).

3. The information is not publicly available elsewhere.

4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to:

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:

I have received and read the notice

SIGNATURE

x *Stanford J. Nudelman*

NAME

STANFORD J. NUDELMAN

TITLE

Owner-Mgr

DATE SIGNED

8/4/88

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.

NAME

TITLE

ADDRESS

PCB INSPECTION PLAN

8/17
8/4/8
ATTACHMENT 3

(Must be Completed and Filed with RSCC and RQAMO for all PCB Inspections)

Status: Enforcement Sensitive ☒; CBI ☐; Open ☒; Routine ☒

Site Identifier:

Nudelman & Son Scrap & Salvage

Authorized Inspector:

Ron Culver

Designated Manager:

Ron Culver

Inspection Team or Delegated Authorities:

Ron Culver

RQAMO Concurrence:

Date:

ESD Peer Review:

Date:

Project Number:

000-054A

Account Number:

AFL-3A

Laboratory Designated:

EPA

CLP

Private

DEQ

Sample Numbers Assigned:

88320075

to

0079 *

Sample Schedule and Milestones:

(This schedule must be filled out ACCURATELY and COMPLETELY)

DATE	8-4-8	8-4-8	8-22-8
ACTIVITY	SAMPLE:	TO LAB	LAB REPORT
MATRIX	1- SOIL 2- OIL Wipe 1- BLANK	(DEQ)	Test result
# OF SAMPLES			

Regional Sample Control Center Review:

Acceptance Date:

"open" section(s) closed on

Project Description and Site Location:

2 acce Scrap pile
2707 Nela St, Portland Oregon 97210

Sample Rational and Network Derivation:

Emergency Response
Spill / Salvage Oil for Transformers

Cooperating Agencies, Involved Parties:

DEQ Relayed TSCA VIO report

Special Considerations or "open" requirements:

(Continue on back if necessary)
* Numbers borrowed from Joes Recycling that was missed 8/3

4/19/87

ND CHAIN OF CUSTODY SHEET

Miscellaneous: Test for PCB Sampling Crew: Ron Culver

YUS

Estuar Soil PCB low to med
Wipe samples med to hi?

Recorder: _____
(Signatures Required)

Ran Cervera

[illegible]

SITE ONLY			CONDITION OF SAMPLES UPON RECEIPT AT LAB:			
E			CUSTODY SEALS INTACT: <input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> none			
ne			CHAIN OF CUSTODY RECORD			
Type	Freq	RELINQUISHED BY: (Signature)		RECEIVED BY: (Signature)		DATE/TIME
		RELINQUISHED BY: (Signature)		RECEIVED BY: (Signature)		DATE/TIME
		RELINQUISHED BY: (Signature)		RECEIVED BY: (Signature)		DATE/TIME
		RELINQUISHED BY: (Signature)		RECEIVED BY MOBILE LAB FOR FIELD ANALYSIS: (Signature)		DATE/TIME
		DISPATCHED BY: (Signature)		DATE/TIME	RECEIVED FOR LAB BY: (Signature)	
		8/4/88			8/4/88 2:20	
METHOD OF SHIPMENT						

Yellow

Field or Office Copy *Pink*

4-19-19

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

RECEIPT FOR SAMPLES AND DOCUMENTS

Form Approved
OMB No. 2070-0007
Approval expires 8-31-88

ATTACHMENT 5

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME
DATE 8/4/88	INSPECTOR NO. 1450	DAILY SEQ. NO.	Nadelman & Son
3. INSPECTOR ADDRESS			4. FIRM ADDRESS
811 SW 6th Av Portland, Ore. 97204			2707 NW Nela St Portland Ore 97210

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Toxic Substances Control Act.

RECEIPT OF THE DOCUMENT(S) AND/OR SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED:

NO.	DESCRIPTION
S-1	Soil / Sand w oil by BPA Bushings 10:30a
S-2	Wipe Sample Cap / Bushing 10:45a
S-3	Wipe Sample Sur. Cap 11:00a
—	Pictures of Yard / Etc Equipment

OPTIONAL:

DUPLICATE OR SPLIT SAMPLES: REQUESTED AND PROVIDED ☐ NOT REQUESTED ☒

INSPECTOR SIGNATURE <i>Ron Culver</i>		RECIPIENT SIGNATURE <i>Stanford Nadelman</i>	
NAME Ron Culver		NAME STANFORD NUDELMAN Owner - Mgr.	
TITLE Env. Engr.	DATE SIGNED 8-4-88	TITLE <i>Env. Engr.</i>	DATE SIGNED 8-4-88

DEPARTMENT OF ENVIRONMENTAL QUALITY

Laboratories and Applied Research Division
1712 S.W. 11th Avenue, Portland, OR 97201

ATTACHMENT 6

LEGAL SAMPLE

Chain of Custody Record

Site Name: S. J. NUDFELMAN + SON, INC. Laboratory Number: 880657
Location: PONTIAC Program Code: 45551
Date Sampled: 8/4/88 Date Received: 8/4/88
Time Sampled: 10:30 - 11:45 AM Time Received: 2:20 PM
Collected By: REN CULVER

Sample Container Information

Container Type/Number	Container Type/Number	Container Type/Number
802 VOA BOTTLE / S-1	/	/
40ml PURGE VIAL / S-2	/	/
40ml PURGE VIAL / S-3	/	/
40ml PURGE VIAL / S-4	/	/
/	/	/
/	/	/

Total Number of Containers Received: 4

Relinquished By: Ren Culver
(signature)

Received By: Bel. W. [Signature]
(signature)

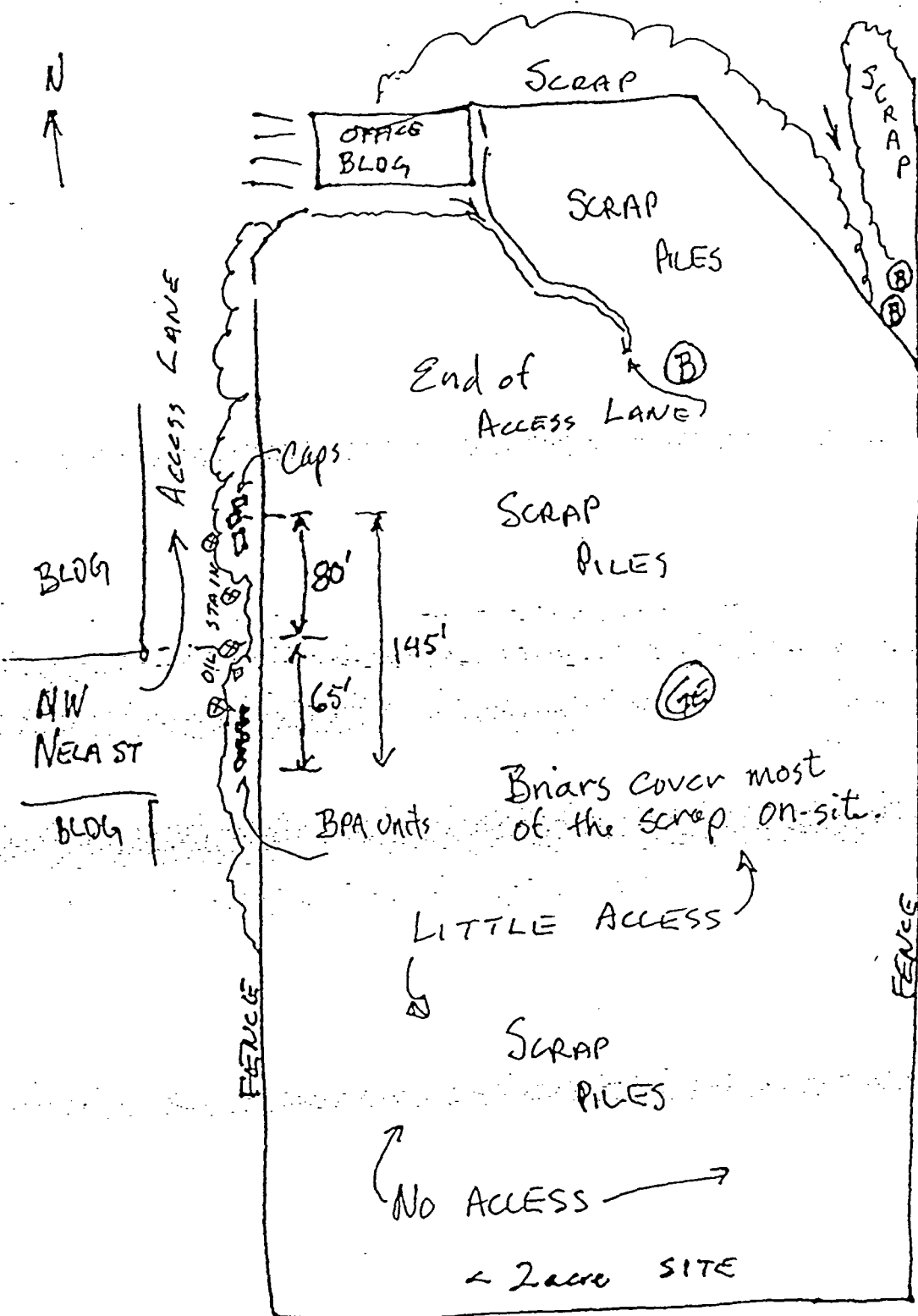
Initial Placement in Refrigerator # 4610

Subsequent Out of Laboratory Transfers:

Relinquished By: _____
(time/date)

Received By: _____
(time/date)

ATTACHMENT 7



ⓑ - BPA Bushing Transformer

ⓐ GE Ele. Transformer

□ Capacitor

⊕ Soil sample composite

NUDELMAN & Son Inc, 2707 N.W. NELA St., PORTLAND

1 & 2 - A panorama looking toward South. A railroad mounted crane is covered by briars in background. Buildings are off site.

3 & 4 - Looking West. Small incinerator visible at left in picture 4. Office is mostly covered by tree in center of 4. Building at left in 4 was not inspected.

5 & 6 - Looking North. Bottom tank from bushing transformer in center of 5. Drums in 6 with unknown content.

7 - Bottom part of bushing transformer; core still inside. Most of the oil was gone.

8 - GE transformer, "High Voltage Testing Set".

9 - Bushing transformers. Rainwater and oil in open pot on left. Unit on right was leaking oil onto the ground as a result of a bushing break.

10 - Salvage of electrical panels by man with torch.

11 - Several pieces of bushing transformers with a lot of recently spilled oil on the ground. Part of sample 1 collected here. Location: near entry at end of Nela Street.

12 - Entry at end of Nela Street. Bushing transformer units may be leaking; too much brush to tell.

13 - Leaking capacitors. No labels visible; sample 2 collected from leak on this unit.

14 - Larger caps at top. Smaller broken cap lower right - still 1/2 full of oil. The small ones may be out of the bushings. They appeared to be from a larger unit. Several were laying around. Sample 3 collected from the small open cap.

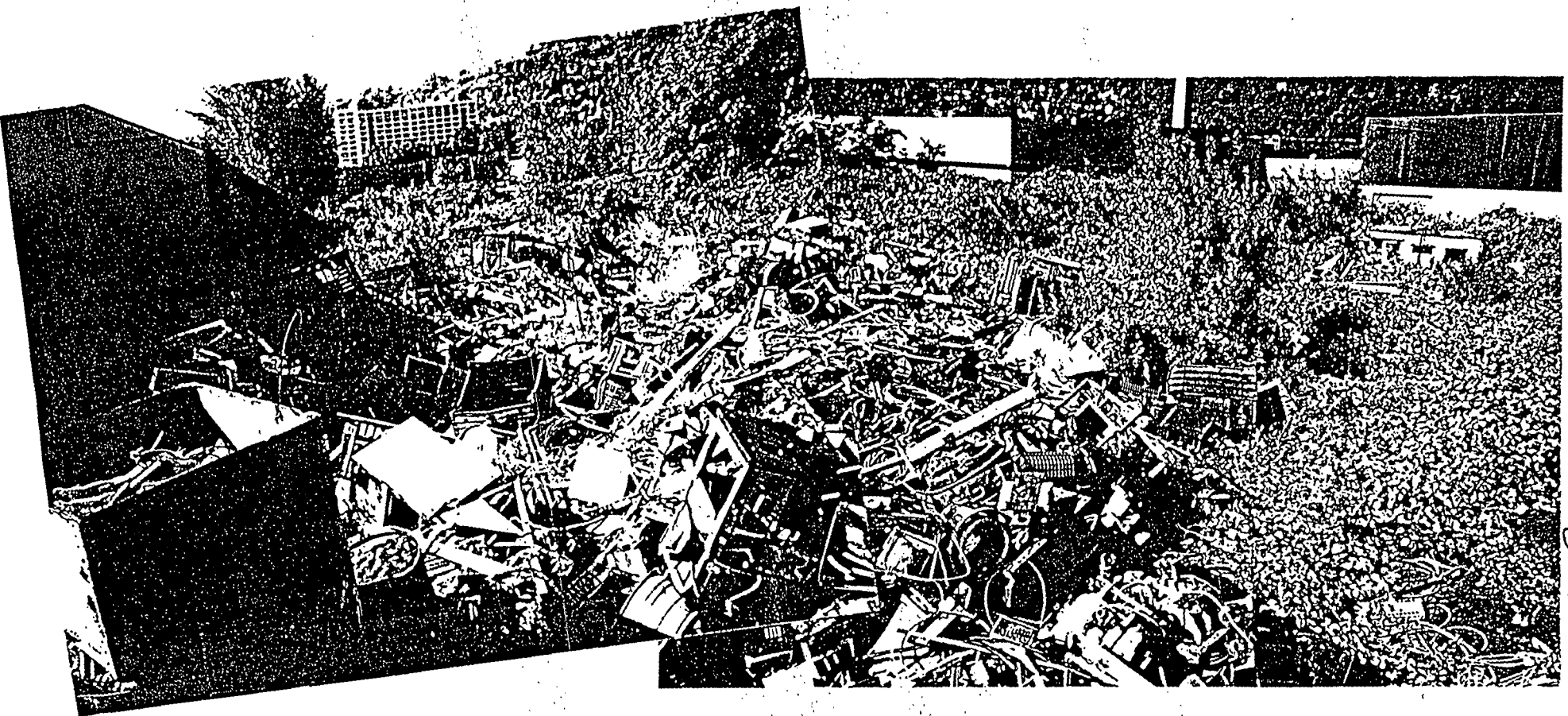
NUDELMAN
8-4-88

ATTACHMENT.

9

2

1



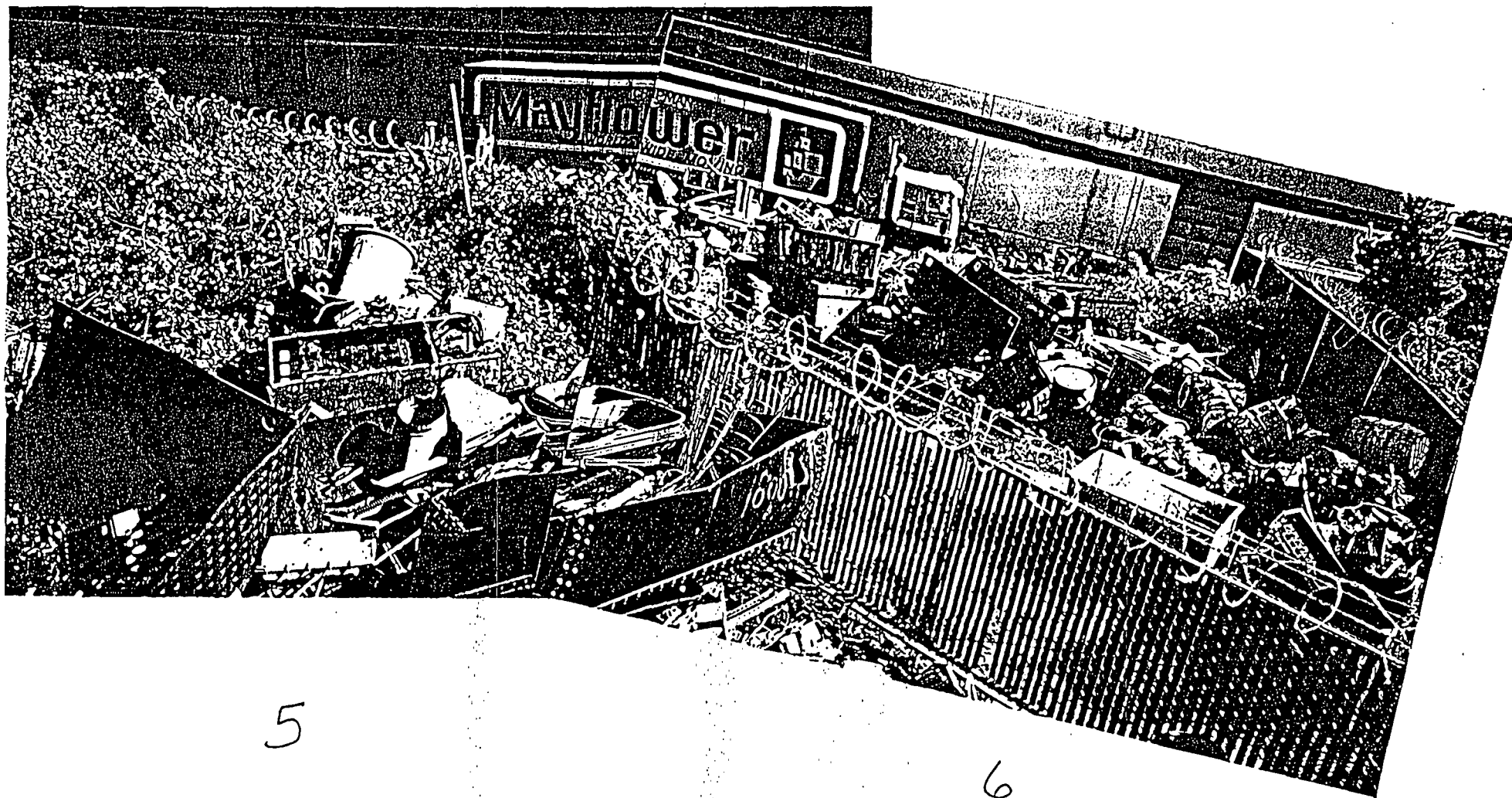


3

4

NOUELMAN
8-4-88

2/6



5

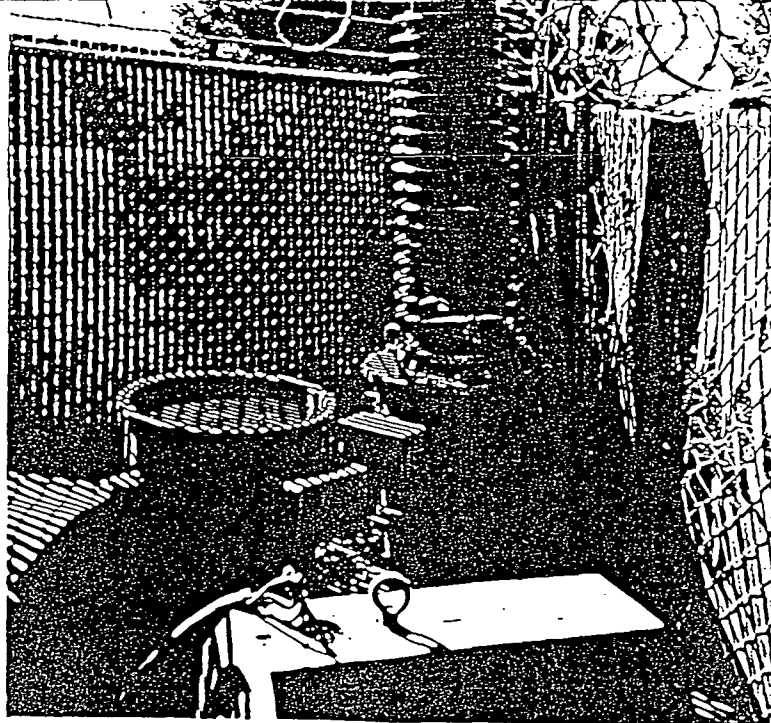
6



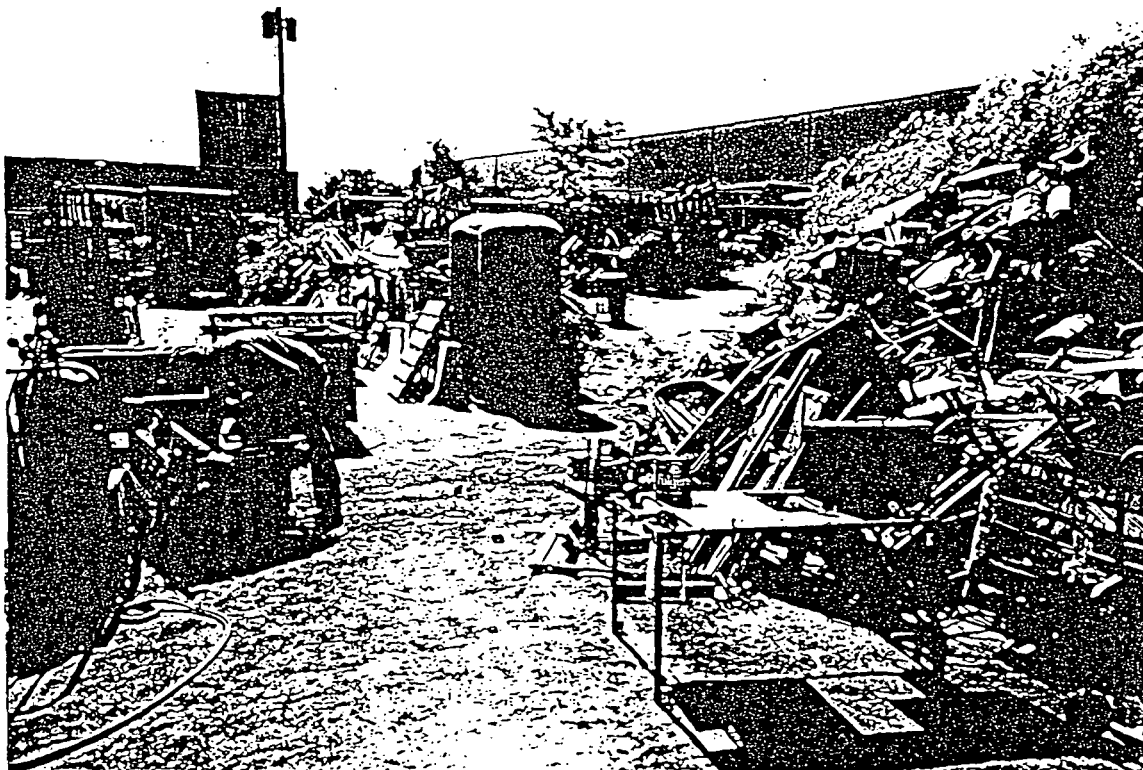
7 ↑



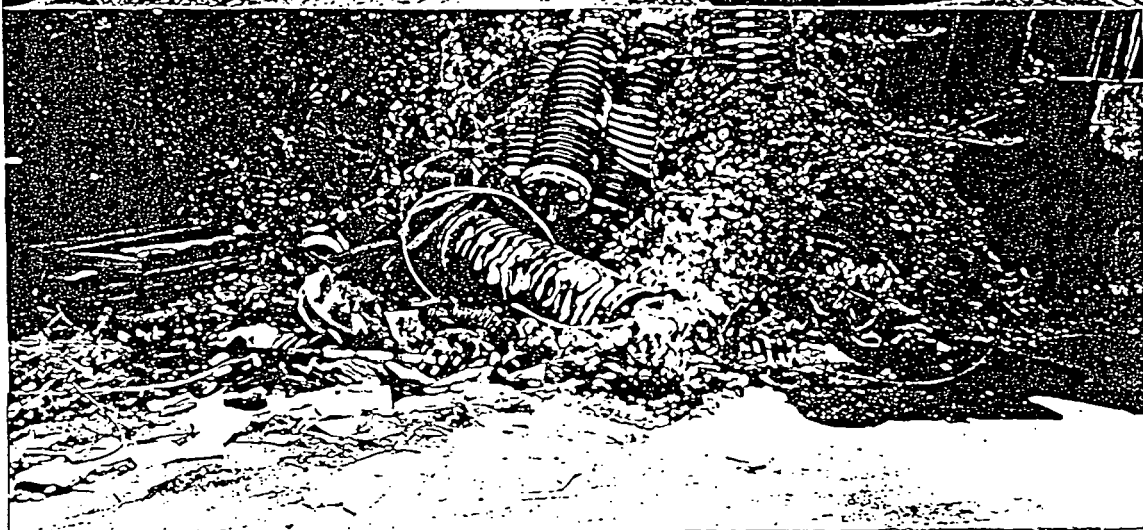
8 1



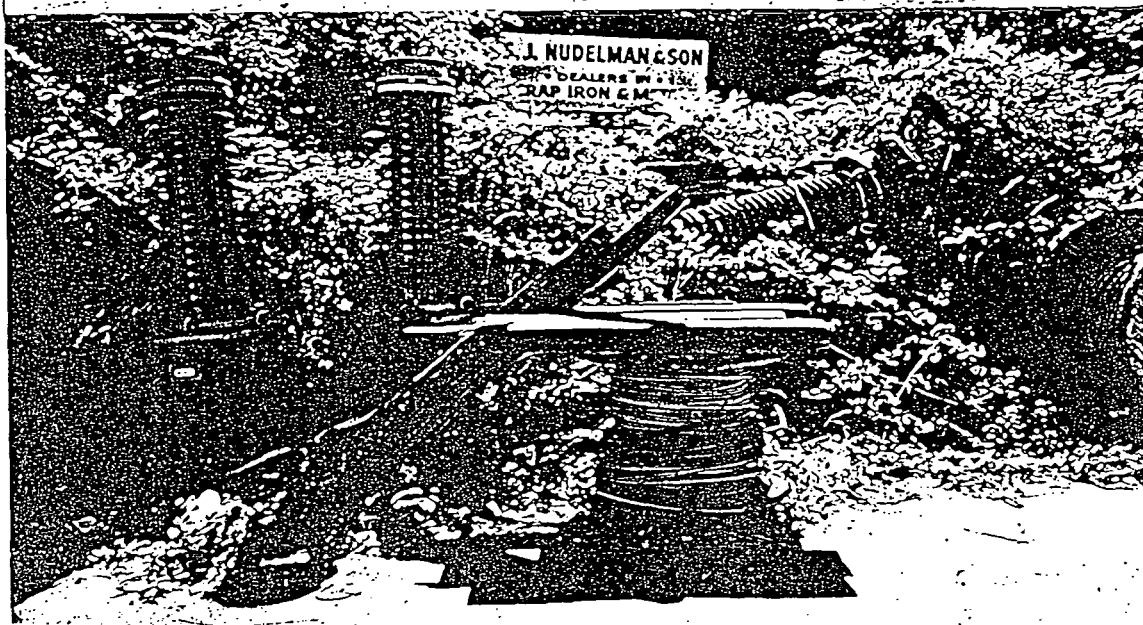
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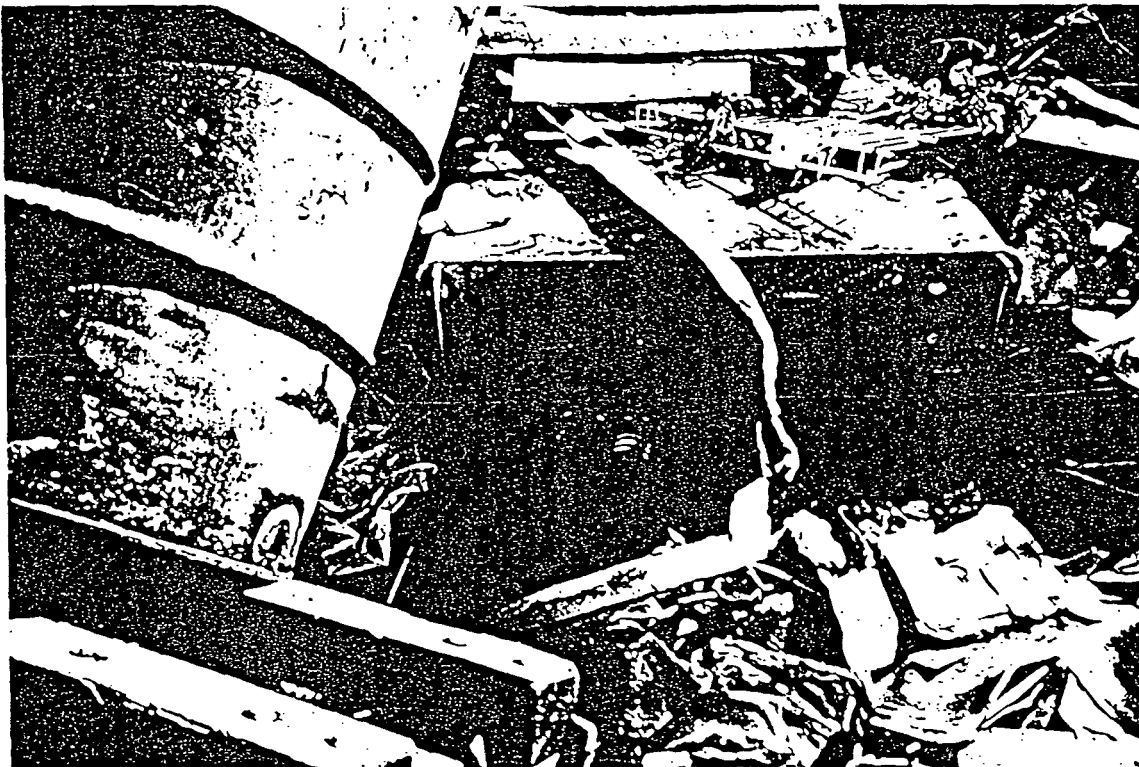
10



11



12



13



14



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OREGON OPERATIONS OFFICE
PORTLAND, OREGON 97204

August 9, 1988

ATTACHMENT 10

REPLY TO 000
ATTN OF:

MEMORANDUM

SUBJECT: S.J. Nudelman & Son, Inc.
Telephone Conference on 8-9-88

FROM: Ron Culver, P.E.
Oregon Operations Office *RW*

TO: File

I asked Mr. Stanford Nudelman the following questions; August 9, 1988 at 9:00 A.M.

1. What did he do with oil from bushings? Reply: He used it for his trucks hydraulic systems. He has no bulk oil storage.

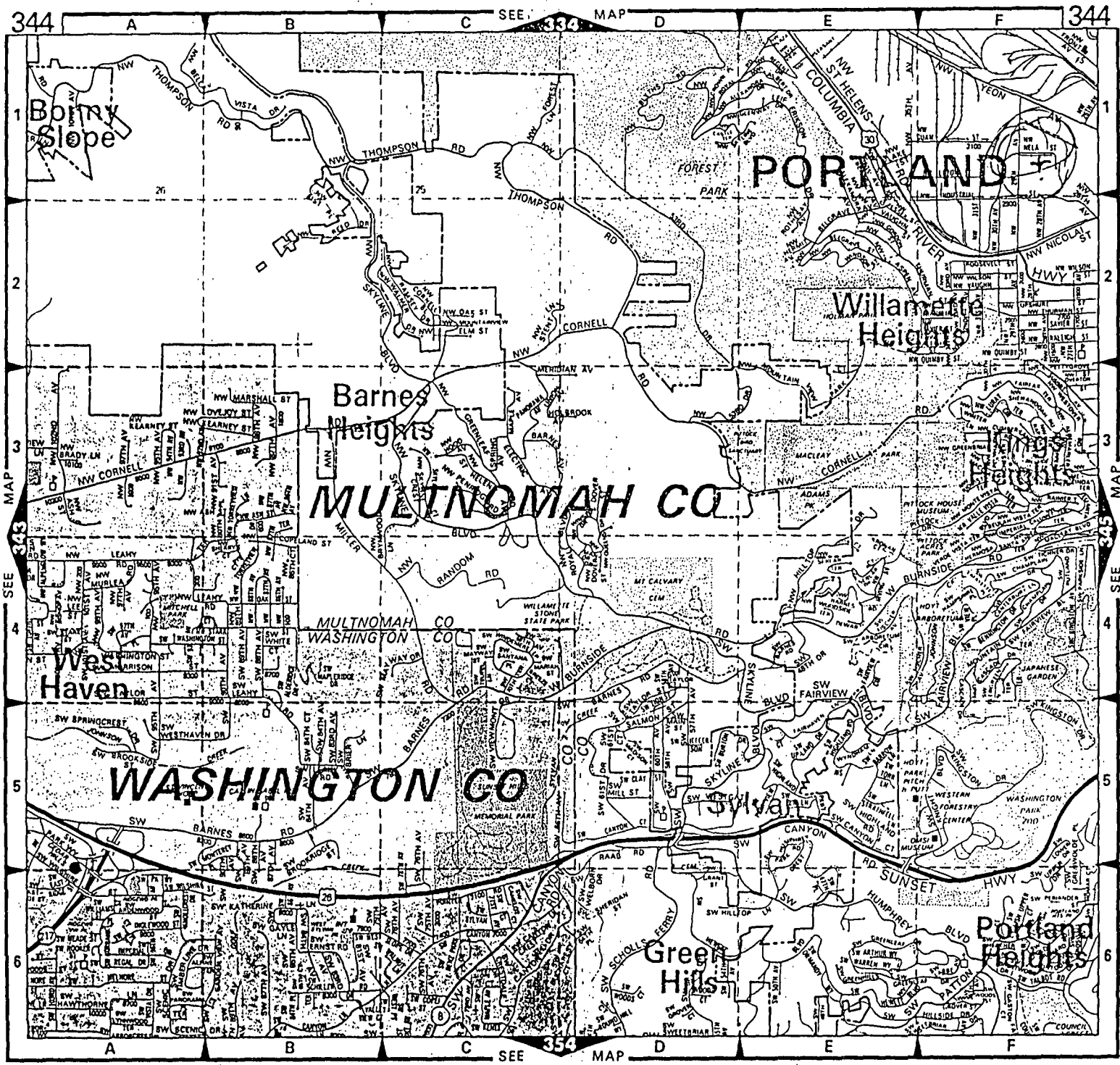
2. I asked if he owns any other sites. Reply: No.

3. I asked about any past burning on site. He said never did he burn on site.

4. I asked about sewers on site. He said there are none. They have a septic tank and no storm or sanitary sewers.

5. I asked if he has any long-term plans for the site. He said no. There are no plans to liquidate or remove scrap on site.

#0609F



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ATTACHMENT